Our current Hazmat program, covered in our OpSpecs and training manual, has worked quite well. We do not tranport Hazmat and have no intention of doing so. To require operators to change their already successful programs only unnecessarily increases the burden.

We also do not do external load work, flight training, or MEDEVAC. Should there be required training for those programs as well? I don't fly Gulfstreams, perhaps I should be required to go to Flight Safety.

I can see no benefit or use for this proposed rule. If ain't broke ...